

EXHIBIT F
PLAINTIFF'S DEPOSITION
DESIGNATIONS

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,

Plaintiff,

- vs. -

Rhodium Enterprises, Inc.;
Rhodium Technologies LLC;
Rhodium 10mw LLC;
Rhodium 2.0 LLC;
Rhodium 30mw LLC;
Rhodium Encore LLC;
Rhodium Renewables LLC;

Defendants.

Civil Action No. 6:22-cv-00050-ADA

Jury Trial Demanded

PLAINTIFF'S PRELIMINARY LIST OF DEPOSITION DESIGNATIONS

Plaintiff Midas Green Technologies, LLC hereby submits the following Deposition Designations that Midas may present as evidence at trial:

<p>Peter Poulin Taken on December 12, 2023</p>	<p>13:4-11; 33:5-20; 36:5-24; 37:19-21; 38:2-43:5; 45:23-50:25; 55:16-56:2; 56:22-57:20; 59:15-61:4; 63:7- 64:4; 70:9-15; 70:25-71:4; 102:5-24; 104:10-105:5; 105:22-106:21; 108:1-21; 114:15-21; 115:13-116:22; 117:13-15; 118:15-119:11; 120:6-20; 127:9-128:4; 140:13-141:17; 142:7-12; 224:21-225:2; 230:15-231:10</p>
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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 6:22-CV-00050-ADA
)	
Rhodium Enterprises, Inc.;)	
Rhodium Technologies LLC;)	
Rhodium 10MW LLC;)	JURY TRIAL DEMANDED
Rhodium 2.0 LLC;)	
Rhodium 30MW LLC;)	
Rhodium Encore LLC;)	
Rhodium Renewables LLC;)	
Rhodium Renewables Sub LLC; and)	
Rhodium Ready Ventures LLC,)	
)	
Defendants.)	
)	

DEFENDANTS’ OBJECTIONS TO PLAINTIFF’S DEPOSITION DESIGNATION
(MARCH 26, 2024)

Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10MW LLC, Rhodium 2.0 LLC, Rhodium 30MW LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, and Rhodium Ready Ventures LLC (“Rhodium”) provide the following objections to the deposition designations Midas has disclosed. Defendants reserve the right to supplement or modify these objections, including to correct any unintentional omissions. Rhodium further objects to Midas’s use of any deposition testimony other than the deposition of Peter Poulin at trial, as Midas has not disclosed deposition designations in keeping with the applicable scheduling order.

Deposition of Peter Poulin

Midas Designation	Rhodium Objections	Rhodium Counter-Designation
13:4-11		
33:5-20		35:12–36:4
36:5-24	Rhodium objects that a clarifying instruction is required, to inform the jury that this testimony refers to work by James Boyd, a GRC employee, not Chris Boyd, Midas’s former employee.	
37:19-21;		
38:2-43:5;	40:14 – Misstates testimony.	43:6–44:8
45:23-50:25;	49:18 – Misstates testimony.	51:1–14
55:16-56:2;	Outside scope	
56:22-57:20;		
59:15-61:4;	60:11 – Misstates testimony	
63:7- 64:4;	Passage should continue through line 6 to complete answer.	64:7–14
70:9-15;	Passage should continue through line 16 to complete answer.	65:7–70:8
70:25-71:4;		71:5–17
102:5-24;	Outside scope, confusing without context.	99:4–102:4
104:10-105:5;		105:7–17
105:22-106:21;	106:18 – Scope, misstates testimony	
108:1-21;	108:17 – Scope, calls for speculation, calls for a legal conclusion	107:17–24, 108:23–109:8
114:15-21;	Absent context, which Midas does not provide, this testimony is entirely unclear. 403.	113:11–114:14
115:13-116:22;		
117:13-15;	No answer designated.	
118:15-119:11;	119:8 – Calls for speculation and legal conclusion	
120:6-20;	120:14 – Calls for speculation and legal conclusion	
127:9-128:4;		
140:13-141:17;		
142:7-12;		
224:21-225:2;	224:24 – Scope, calls for speculation and legal conclusion	225:4–227:15
230:15-231:10		

DATED: March 26, 2024

Respectfully submitted,

/s/ Elizabeth Brannen

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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2024, I served the foregoing document by e-mail on counsel of record for Plaintiff Midas Green Technologies, LLC.

/s/ Peter J. Brody

Peter J. Brody